

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 94105

June 19, 2000

Mr. Richard Mach Department of the Navy Naval Facilities Engineering Command Southwest Division BRAC Office 1220 Pacific Highway San Diego, CA 92132-5190

RE: <u>EPA Review and Comment on the Draft Phase IV Radiation Investigation Report,</u> <u>Hunters Point Shipyard</u>

Dear Mr. Mach:

EPA has completed its review of the Draft Hunters Point Shipyard Phase IV Radiation Investigation Report and has the following comments:

Section 4.1, page 7: US EPA Superfund prefers using the non-parametric Wilcoxon Rank Sum (WRS) test as the statistical method for determining indistinguishability from background at NPL sites. The NRC's three times the standard deviation of the reference background area may be used for screening purposes in some situations.

Section 4.2, page 7: Regarding the statement "the California Department of Toxic Substance Control's (DTSC) basic dose limit of 25 millirem per year"; EPA does not believe that DTSC has officially adopted the NRC's 25 millirem per year rule. However, since California is an NRC agreement state, the California Department of Health Services Radiological Health Branch does endorse the 25 millirem per year standard.

Section 5.2, page 11: EPA agrees with the Navy's recommendation to remove the radioactive contamination outside Buildings 364 and 707 "to levels consistent with the decay-corrected PRGs" providing this means removal to decay-corrected PRG levels or less.

Questions or comments concerning this review should be directed to Steve Dean at (415) 744-2391.

Sincerely,

Claire Trombadore

Remedial Project Manager C 055108